

AFFIDAVIT

I, Cristin Stammler, being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This affidavit is in support of an application for a warrant to search 120 Park Avenue, Kansas City, Jackson County, Missouri 64124 (the SUBJECT PREMISES) as described more fully in Attachment A.

2. The requested search warrant seeks authorization to seize evidence, fruits, or instrumentalities of violations of 21 U.S.C. § 841(a)(1) (possession with intent to distribute and distribution of controlled substances), 21 U.S.C. § 846 (conspiracy and attempt to distribute controlled substances), 18 U.S.C. § 1956(h) (money laundering conspiracy), and 18 U.S.C. § 1956(a) (money laundering) as described more fully in Attachment B. Attachments A and B are incorporated herein by reference.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested search warrant and does not purport to set forth all of my knowledge of the investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

BACKGROUND OF AFFIANT

4. I am a Detective with the Kansas City, Missouri Police Department (KCPD) and have been so employed since 2006. I am currently assigned to the Financial Investigations Section and am a Task Force Officer with the Federal Bureau of Investigation (FBI). In connection with my official duties, I investigate criminal violations of the Controlled Substances Act, among other

crimes. I have received specialized training in the enforcement of federal narcotics laws and other laws. My training and experience has involved, among other things, (a) the debriefing of defendants, witnesses, and informants who have knowledge of the distribution and transportation of controlled substances, and of the laundering and concealment of proceeds of drug trafficking; (b) surveillance; (c) analysis of documentary and physical evidence; and (d) participation in previous wire intercept investigations. Based on my training and experience, I have become familiar with the manner in which narcotics traffickers conduct their drug-related businesses, including the methods employed by narcotics distributors to import and distribute narcotics, and their use of coded language to refer to narcotics, drug proceeds, and other aspects of narcotics trafficking. I received law enforcement training for the investigation of money laundering offenses and participated in investigations of the possession, manufacture, and distribution of controlled substances, including cocaine, methamphetamine, crack cocaine, and marijuana. I have also acquired knowledge and information about investigations from on-the-job training, from other law enforcement officers, and from other investigations that I have conducted or have been so involved.

PROBABLE CAUSE

5. The FBI and KCPD have actively been investigating a Drug Trafficking Organization (DTO) that has been operating in Kansas City, Missouri area. The investigation into this DTO has shown that these individuals are involved with the distribution of illegal controlled substances, including marijuana. The DTO also conceals the profits obtained from the sale of marijuana, and utilizes proceeds to acquire goods and promote the ongoing drug trafficking conspiracy.

6. On September 10, 2020, an arrest warrant was issued in the Western District of Missouri for Dominic Serrone, authorizing the arrest for violation of Title 21 USC §§ 841(a)(1), 841(b)(1)(A), and 846, Conspiracy to Distribute Marihuana.

7. On September 15, 2020, members of the KCPD Street Narcotics Unit Tactical (SNUTAC) executed the arrest warrant for Dominic Serrone at 120 Park Avenue, Kansas City, Jackson County, Missouri. KCPD SNUTAC 1910 Squad knocked and announced at the front door of the residence, and due to an extended delay in anyone responding to the front door and sounds coming from inside the residence, SNUTAC forced entry into the house. KCPD SNUTAC announced their presence and made verbal commands for Serrone to come to the front door of the residence. Serrone complied with KCPD SNUTAC and came to the front door of the residence.


8. A protective sweep of the residence revealed the following items in plain view:

- Two guns on the closet shelf in the southeast bedroom;
- Green leafy substance on the counter kitchen;
- A black duffle bag with approximately four 1 pound bags of green leafy substance on a dog kennel in the kitchen;
- Green leafy plant on the basement floor;
- Approximately 20 pots with green leafy substance on the kitchen floor with lights above and a fan, all at different stages of growth; and
- There was an overwhelming odor of marijuana throughout the SUBJECT PREMISES.

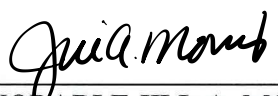
9. Serrone was transported to FBI HQ on September 15, 2020, located at 1300 Summit Street, Kansas City, Missouri. After being advised of his *Miranda* rights, Serrone admitted to being a marijuana user.

CONCLUSION

10. Based upon the information described above, I have probable cause to believe that violations of 21 USC §§ 841(a)(1) 846 have been committed, are being committed, and will continue to be committed at 120 Park Avenue, Kansas City, Jackson County, Missouri. Based on the above information, I believe there is probable cause that evidence of these crimes will be located at this residence. I respectfully petition the Court for a warrant authorizing the search of the residence located at 120 Park Avenue, Kansas City, Jackson County, Missouri, in order to search and seize those items listed in Attachment B of the search warrant and attached herein, for potential violations of 21 USC §§ 841(a)(1) 846.

 #5312
CRISTIN STAMMLER
Task Force Officer
Federal Bureau of Investigation

Sworn and attested by affiant via telephone, after being submitted to me by reliable electronic means on this 15th day of September 2020.


HONORABLE JILL A. MORRIS
United States Magistrate Judge
Western District of Missouri